

## SCHWARTZ, CONROY & HACK, PC

*Making Insurance Companies Keep Their Promises*

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October 15, 2021

### **VIA ECF FILING**

The Honorable Ramon E. Reyes, Jr.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

RE: *Allstate Ins. Co., et al. v Hollis Novel Comprehensive Medical, P.C., et al.*  
No. 1:20-cv-06108-ENV-RER (E.D.N.Y.)

Dear Judge Reyes:

My firm represents the following Defendants in the above-referenced matter:  
Hollis Novel Comprehensive Medical, P.C., Starrett City Medical, P.C., Hillcrest Medical Care, P.C., Smart Choice Medical, P.C., Azu Ajudua, M.D., Rolando Jose Mendez Chumaceiro, M.D., Vyacheslav Mushyakov, LL Consulting Group Inc. d/b/a Billing For You, Keepers For You Corp., Aleksandr Gulkarov, Leonard Luna, D.C. and Roman Israilov, On behalf of my clients I respectfully request an additional extension of time until October 22, 2021 to file a stipulation of dismissal. The former filing deadline was October 08, 2021, which was set by this Court's order dated October 05, 2021.

An extension until October 22 is needed because certain Defendants require additional time to fully execute the settlement agreement. I have received fully executed Agreements from eleven (11) Defendants and their companies, I am awaiting two (2) additional Defendants to return the executed Agreement. This is the parties' fifth request to extend the stipulation of dismissal deadline. The parties' first request was filed on August 13, 2021 (ECF No. 49) and granted on August 16, 2021. Counsel for Plaintiff and counsel for the remaining appearing Defendants have consented to this request.

Respectfully submitted,

/s/ Matthew J. Conroy

Matthew J. Conroy (MC9014)

cc: Counsel of record (via ECF only)

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